

Leonard W. Williamson, OSB #910020
 VAN NESS WILLIAMSON LLP
 960 Liberty St. SE, Suite 100
 Salem, Oregon 97302
 (503) 365-8800
 l.williamson@vwllp.com

Bradley A. Benbrook*
 Stephen M. Duvernay*
 BENBROOK LAW GROUP, PC
 701 University Avenue, Suite 106
 Sacramento, California 95825
 (916) 447-4900
 brad@benbrooklawgroup.com
 steve@benbrooklawgroup.com

**Pro hac vice applications to be submitted*

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

DALLIN MONTGOMERY; NICK
 HOLDWAY; KEVIN WALTERS; OREGON
 FIREARMS FEDERATION; and FIREARMS
 POLICY COALITION, INC.,

Plaintiffs,

v.

ELLEN ROSENBLUM, in her Official
 Capacity as Oregon Attorney General; and
 CASEY CODDING, in his Official Capacity as
 Superintendent of the Oregon State Police,

Defendants.

Case No.: 3:24-cv-01273-AN

**DECLARATION OF DALLIN
 MONTGOMERY IN SUPPORT OF
 MOTION FOR TEMPORARY
 RESTRAINING ORDER AND/OR
 PRELIMINARY INJUNCTION**

**EXPEDITED HEARING AND ORAL
 ARGUMENT REQUESTED**

**RELIEF REQUESTED BEFORE
 SEPTEMBER 1, 2024**

I, Dallin Montgomery, declare:

1. I am over 18 years old. I am competent to give this declaration. I have personal knowledge of the matters set forth in this declaration and would be able to testify to them if called as a witness.

2. I am a citizen of the United States and a resident of the State of Oregon, currently residing in Clackamas County, Oregon.

3. I am a member of Firearms Policy Coalition, Inc. and Oregon Firearms Federation.

4. I hold an Oregon concealed carry permit issued by the Clackamas County Sheriff's Office and a Washington concealed carry license.

5. I am not a federally or state licensed firearms manufacturer, importer, or dealer.

6. I am aware of Oregon House Bill 2005's prohibitions on items it defines as an "unfinished frame or receiver" and "undetectable firearm." I am also aware that HB 2005 will take effect on September 1, 2024.

7. I possess an unserialized Glock-style semiautomatic pistol built from a self-manufactured polymer frame, which I believe falls within HB 2005's definitions of "unfinished frame or receiver" and "undetectable firearm." I desire to continue to own and possess this arm for self-defense and other lawful purposes, and not to sell or otherwise dispose of it. As I understand HB 2005, it does not permit me to retain possession of an "undetectable firearm" even if it were serialized. Even if it did, I do not want to incur the cost to serialize these items and prefer not to do so because serialization is permanent and cannot be undone should I prevail in this lawsuit. Furthermore, because HB 2005 criminalizes the mere possession of an unserialized "unfinished frame or receiver," I see no clear legal path as to how I could comply with the law through serialization. In short, I must either surrender or destroy the items.

8. But for HB 2005 and its threat of criminal sanctions (including fines and/or imprisonment that could lead to the loss of my Second Amendment protected rights), I would build or acquire additional arms that fall within HB 2005's prohibitions, including by purchasing such items on the Internet through out-of-state retailers for shipment into Oregon.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed August 7, 2024.

DocuSigned by:
Dallin Montgomery
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Dallin Montgomery